



CLAUSEN MILLER P.C.
CHICAGO, IL
NEW YORK
CALIFORNIA
NEW JERSEY
INDIANA
WISCONSIN
CONNECTICUT
CLAUSEN MILLER LLP
LONDON, ENGLAND

CMI  **CLAUSEN MILLER INTERNATIONAL**
Clausen Miller LLP, LONDON
Clausen Miller P.C.
Grenier Avocats, PARIS
Studio Legale Corapi, ROME
van Cutsem-Wittamer-Marnef & Partners, BRUSSELS
Wilhelm Partnerschaft von Rechtsanwälten mbB, DÜSSELDORF

Attorneys at Law

28 Liberty Street, 39th Floor • New York, NY 10005 • www.clausen.com
Tel: 212.805.3900 • Fax: 212.805.3935

Matthew J. Van Dusen, Esq.
Direct Line: 212-805-3956
E-Mail: mvandusen@clausen.com

March 23, 2018

VIA ECF:

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-415

Re: *The Wave Studio, LLC v. General Hotel Management, Ltd., et al.*
Civil Action No.: 7:13-cv-09239-CS
Our File No.: 24-7287-00-6

Dear Judge Seibel:

This firm represents the following defendants in the above-action and consolidated actions:

- 1) About, Inc. d/b/a About.com;
- 2) Alliance Reservation Network d/b/a Reservetravel.com;
- 3) Bookit.com, Inc.;
- 4) Expedia, Inc. d/b/a Expedia.com;
- 5) Fareportal, Inc. d/b/a Cheapoair.com;
- 6) Farebuzz d/b/a Farebuzz.com;
- 7) Frommer Media d/b/a Frommers.com;
- 8) Getaroom.com d/b/a Getaroom.com;
- 9) Hotels.com GP LLC d/b/a Hotels.com d/b/a Travelnow.com;
- 10) Hotelsbyme d/b/a Hotelsbyme.com;
- 11) Lexyl Travel Technologies d/b/a Hotelplanner.com;
- 12) Esteban Oliverez d/b/a Insanelycheapflights.com;
- 13) JetBlue Airways Corporation d/b/a JetBlue.com;
- 14) Kayak Software Corporation d/b/a Kayak.com;
- 15) Lonely Planet Global, Inc. d/b/a Lonelyplanet.com;
- 16) Metro Travel Guide d/b/a Metrotravelguide.com;
- 17) Netadvantage.com d/b/a IHSadvantage.com;
- 18) Reservation Counter d/b/a Reservationcounter.com;
- 19) Pegasus Solutions, Inc.;
- 20) Random House d/b/a Fodors.com;
- 21) This Exit, LLC d/b/a Roadsideamerica.com;
- 22) Travelocity.com d/b/a Travelocity.com;
- 23) Tripadvisor, LLC d/b/a Tripadvisor.com;
- 24) United Airlines, Inc. d/b/a Hotels.United.com;
- 25) Gogobot, Inc. d/b/a gogobot.com;
- 26) Qantas Airways Ltd.;
- 27) WK Travel, Inc.;
- 28) AOL, Inc.;
- 29) Travelzoo, Inc.;
- 30) Charles Kessler Associates, Inc.;
- 31) United Airlines, Inc. Successor-In-Interest to Continental Airlines, Inc.;
- 32) Swiss International Air Lines, LTD;
- 33) Virgin America, Inc.;
- 34) Virgin Vacations, Inc.;
- 35) Virgin Atlantic Airways Limited;
- 36) Swiss International Airlines Ltd.;
- 37) Groupon, Inc. and
- 38) VFM Leonardo, Inc.

Please accept this letter in response to the Court's Order, dated March 12, 2018 (Document 238)("Order") that provided: "The parties should advise by letter, no later than 3/23/18, what they think should happen to the defendants in 13-CV-9239



The Wave Studio, LLC v. General Hotel Management, Ltd., et al.
Civil Action No.: 7:13-cv-09239-CS
March 23, 2018

other than GHM and to the cases related to 13-CV-9239.” In light of the Order, we have communicated with Plaintiff’s counsel, Nate Garhart, regarding Plaintiff’s compliance with the Court’s Summary Judgment Decision directing Plaintiff to commence an action against defendant General Hotel Management, Ltd. in Singapore. Mr. Garhart has advised that Plaintiff, via its Singapore counsel, is apparently in process, but has not yet filed an action in Singapore and understands that Singapore counsel is now moving forward and will file in due course. As such, the above-referenced defendants, along with Plaintiff, desire that the stay in this action remain in place pending complete resolution of the forthcoming Singapore matter.

As such, we respectfully request that the Stay remain in effect until the forthcoming Singapore matter and any related appeals are completed.

Respectfully submitted,

A handwritten signature in blue ink that reads "Matthew J. Van Dusen".

By: Matthew J. Van Dusen